IRELL & MANELLA LLP
Alexander F. Wiles (CA 73596)
Brian Hennigan (CA 86955)
Stephanie Kaufman (CA 162644)
Trevor V. Stockinger (CA 226359)
1800 Avenue of the Stars, Suite 900
Los Angeles, California 90067-4276
Telephone: (310) 277-1010
Facsimile: (310) 203-7199

ARNOLD & PORTER LLP
Kenneth A. Letzler (*Pro Hac Vice*)
555 Twelfth Street, NW
Washington, DC 20004-1206
Telephone: (202) 942-5000
Facsimile: (202) 942-5999

Attorneys for Plaintiff
GlaxoSmithKline

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

SMITHKLINE BEECHAM CORPORATION, d/b/a GLAXOSMITHKLINE, Plaintiff, vs. ABBOTT LABORATORIES, Defendant.	Case No. C 07-5702 CW *Related by Order to:* Case No. C 04-1511 CW **SUPPLEMENTAL RESPONSE TO ABBOTT LABORATORIES' FIRST SET OF REQUESTS FOR DOCUMENTS AND THINGS TO PLAINTIFF** The Honorable Judge Claudia Wilken

Pursuant to Federal Rule of Civil Procedure 34, plaintiff SmithKline Beecham Corporation d/b/a GlaxoSmithKline ("GSK") responds to Defendant Abbott Laboratories' ("Abbott") First Set of Requests for Production of Documents And Things ("Requests").

GENERAL STATEMENT AND OBJECTIONS

1. This response is made solely for the purpose of this action, and documents identified and produced in response to the Requests are produced solely for purposes of this action. This response is subject to all objections as to competence, relevance, materiality, propriety and admissibility, and to any and all other objections on any grounds for exclusion of evidence, all of which are expressly reserved and may be interposed at the time of trial. The assertion of any objection to the Requests below is neither intended as, nor shall in any way be deemed, a waiver of GSK's right to assert that or any other objection at a later date. Specific objections to each Request are made on an individual basis in GSK's responses below. In addition to these specific objections, GSK makes certain general objections to the Requests. These general objections are hereby incorporated into the responses made with respect to each separate Request as though set forth in full therein. For particular emphasis, GSK has, from time to time, expressly included one or more of the general objections in the specific responses below. GSK's responses to each individual Request are submitted without prejudice to, and without in any respect limiting or waiving, any general objections not set forth in that response. In addition, the failure to include at this time any general objection or specific objection to a specific Request is neither intended as, nor shall be in any way deemed, a limitation or waiver of GSK's right to assert that or any other objection at a later date. No incidental or implied admissions are intended by the responses below. For example, an agreement by GSK to produce a category of documents is not intended as an admission that any responsive documents were created or exist.

2. GSK objects to the Requests to the extent they call for the production of documents that fall within the protection of the attorney-client privilege, the attorney work-product doctrine, informer privilege, joint defense privilege, settlement privilege or any other applicable privilege or doctrine. GSK also specifically objects to the requests to the extent they purport to place a burden upon GSK to log privileged communications with outside litigation counsel of record or

documents created after the present suit was filed. To the extent any privileged document is inadvertently produced, GSK reserves all its rights under Federal Rule of Civil Procedure 26. GSK will identify the documents or information created before November 9, 2007, the date the Complaint in this action was filed, for which it asserts a claim of privilege.

3. GSK objects to the Requests to the extent they seek the disclosure of information that is not relevant to the subject matter of this action or that is not reasonably calculated to lead to the discovery of admissible evidence.

4. GSK objects to the Requests to the extent they seek the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. By these responses, GSK undertakes no obligation to collect or produce any public documents available to Abbott.

5. GSK objects to the Requests to the extent they seek to impose upon GSK greater burdens than are established by the rules governing responses to requests for production.

6. GSK objects to the Requests as overbroad, oppressive, and unduly burdensome. GSK particularly objects to Abbott's definition of "Plaintiff" and "you" as vague, overbroad, oppressive, and unduly burdensome. GSK will treat these terms as referring to plaintiff GSK. GSK also particularly objects to Abbott's definition of "Defendant" and "Abbott" as vague, overbroad, oppressive, and unduly burdensome. GSK will treat these terms as referring to Abbott. GSK further particularly objects to the definition of "License Agreement" as vague, ambiguous and overbroad. GSK further objects to the definitions of the terms "Abbott Competitors," "Non-Nucleoside Reverse Transcriptase Inhibitors," "NNRTIs," "Nucleotide/Nucleoside Reverse Transcriptase Inhibitors," "NRTIs," "Protease Inhibitors," "PIs," "Entry Inhibitors," “Antiretroviral Drugs," "ARV Drugs," and "Lexiva," as vague, ambiguous, unduly burdensome, harassing, oppressive, and overbroad, particularly to the extent that these definitions purport to impose duties beyond those imposed by the Federal Rules of Civil Procedure or the Local Rules.

7. GSK objects to the Requests as overbroad, oppressive, and unduly burdensome to the extent they request documents without any time limitation. GSK will produce documents created from January 1, 1999 to December 31, 2004, unless otherwise specified.

8. GSK objects to the Requests as a whole based on their duplicative and redundant nature. GSK's response to any particular Request does not in any way imply or express that such Request is unique or covers subject matter different in scope from that of prior or succeeding requests.

9. GSK objects to the Requests to the extent they purport to require GSK to search for documents and files that are not within GSK's possession, custody or control. GSK will use reasonable diligence to locate documents in facilities directly under its control based upon an examination of those files reasonably expected to yield responsive documents.

10. GSK objects to the Requests to the extent they seek documents that GSK is not permitted to disclose pursuant to protective orders or confidentiality obligations or agreements with third parties.

11. GSK's responses, while based on diligent exploration by GSK and its counsel, reflect the current state of GSK's knowledge, understanding, and belief with regard to matters about which inquiry has been made. Discovery in this case is not complete, and consequently, GSK continues to investigate the facts relating to this action. GSK anticipates that, as this action proceeds, further facts or documents may be discovered, or their significance better understood, and GSK reserves the right to modify or supplement its responses with such pertinent documents. Furthermore, these responses are given without prejudice to GSK's right to use or rely on at any time, including trial, any subsequently discovered documents, or any documents omitted from this production by inadvertence, oversight, or otherwise.

12. GSK objects to the Definitions and Instructions of the Requests to the extent they purport to impose duties beyond those imposed by the Federal Rules of Civil Procedure or the Local Rules. GSK will comply with the Federal Rules of Civil Procedure and the Local Rules.

Subject to the foregoing General Objections, all of which are incorporated by reference below in each separate response, GSK responds to Abbott's Requests as follows:

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

All documents relating to the price difference between boosted Lexiva and unboosted Lexiva, including documents discussing GSK's concerns relating to the "glaring price differences" between the two regimens, as noted in the internal GSK document titled "908 Financial Environment."

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

GSK incorporates by reference its General Objections. GSK objects to this request to the extent it seeks documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly in that the request takes out of context the term "glaring price differences," it presumes facts, and it does not clearly specify to which document it is referring. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors, which GSK believes will include the requested documents.

REQUEST FOR PRODUCTION NO. 2:

All documents relating to Kaletra's potency, including those explaining Kaletra's "potency advantage," as noted in the internal GSK document titled "908 Competitive Position."

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "potency." The request is also vague and ambiguous because it takes out of context the term "potency advantage," it presumes facts, and it does not clearly specify to which document it is referring. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents concerning the therapeutic performance, safety or efficacy of GSK's protease inhibitors located after a reasonable search and Kaletra when used to treat HIV/AIDS. GSK also refers Abbott to its response to Request No. 18.

REQUEST FOR PRODUCTION NO. 3:

All documents relating to the reason or reasons GSK has "consistently assumed Kaletra remains market leader," as noted in the internal GSK document titled "908 Competitive Position."

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly in that the request takes out of context the phrase "consistently assumed Kaletra remains market leader," it presumes facts, and it does not clearly specify to which document it is referring. GSK further objects to this request as based on statements subject to proof. GSK further objects to this request to the extent that it calls for production of documents and information that are protected by the attorney-client privilege, the

informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 4:

All documents relating to or discussing the "PR risk" of Lexiva's pricing structure, as noted in the internal GSK document titled "908 Overview."

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly in that the request takes out of context the term "PR risk," it presumes facts, and it does not clearly specify to which document it is referring. GSK further objects to this request as based on statements subject to proof. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors, which GSK believes will include the requested documents.

REQUEST FOR PRODUCTION NO. 5:

All documents relating to or discussing GSK's concern that ritonavir boosting "cuts revenue per patient by half!!" as noted in the internal GSK document titled "908 Overview."

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly in that the request takes out of context the phrase "cuts revenue per patient by half!!" it presumes facts, and it does not clearly specify to which document it is referring. GSK objects to this request as based on statements subject to proof. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors, which GSK believes will include the requested documents.

REQUEST FOR PRODUCTION NO. 6:

All documents relating to any perception that Agenerase is or was an inferior drug, including those that discuss the "AGN [Agenerase] baggage" on Lexiva's performance, as noted in the internal GSK document titled "908 Positioning."

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly in that the request takes out of context the phrase "AGN [Agenerase] baggage," it presumes facts, and it does not clearly specify to which document it is referring. GSK further objects to this request as based on statements subject to proof. GSK further objects to this request to the extent that this request calls for production of

documents and information that are protected by the attorney-client privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search relating to the therapeutic performance, safety or efficacy of Lexiva and Agenerase when used to treat HIV/AIDS. GSK also refers Abbott to its response to Request No. 18.

REQUEST FOR PRODUCTION NO. 7:

All documents related to Pete Hare's (VP, HIV Business Unit, HIV Division) presentation to investors on September 17, 2007 in Philadelphia, PA, including: (i) documents supporting his presentation; and (ii) any transcript or recording of his presentation.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

GSK incorporates by reference its General Objections. GSK objects to this request to the extent it seeks documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents responsive to this request that are located after a reasonable search.

REQUEST FOR PRODUCTION NO. 8:

All press releases related to Lexiva.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents responsive to this request that are located after a reasonable search.

REQUEST FOR PRODUCTION NO. 9:

All copies of "HIV Strategy Updates."

RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

GSK incorporates by reference its General Objections. GSK objects to this request to the extent it seeks documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly to the extent this request seeks documents unbounded by a relevant time period or subject matter. GSK further objects to this request as vague and ambiguous, particularly as to the term "HIV Strategy Updates." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is

equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors, which GSK believes will include the requested documents.

REQUEST FOR PRODUCTION NO. 10:

All copies of the "Strategic Brand Plan" for Lexiva.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "Strategic Brand Plan." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors, which GSK believes will include the requested documents.

REQUEST FOR PRODUCTION NO. 11:

All documents relating to and discussing each of your price increases on Lexiva, including your price increases on or about January 2004, January 2005, January 2006, December 2006, and August 2007.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors.

REQUEST FOR PRODUCTION NO. 12:

All documents that discuss Lexiva's performance in the marketplace and any factors impacting Lexiva's performance, including, but not limited to: (i) the timing of Lexiva's launch and, particularly, the fact that it post-dated the launch of Reyataz; (ii) the performance of Agenerase; and (iii) the proximity of the Lexiva launch to the holiday season.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "performance." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to

protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors, which GSK believes will include the requested documents.

REQUEST FOR PRODUCTION NO. 13:

All documents relating to your plan or strategy, at any time, to convert patients from Agenerase to Lexiva.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13:

GSK incorporates by reference its General Objections. GSK objects to this request to the extent it seeks documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors, which GSK believes will include the requested documents.

REQUEST FOR PRODUCTION NO. 14:

All documents relating to clinical studies of Lexiva, including all documents relating to the KLEAN, ALERT, and CONTEXT studies.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14:

GSK incorporates by reference its General Objections. GSK objects to this request to the extent it seeks documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search relating to the therapeutic performance, safety or efficacy of Lexiva and Agenerase when used to treat HIV/AIDS. GSK also refers Abbott to its response to Request No. 18.

REQUEST FOR PRODUCTION NO. 15:

All documents relating to your decision to proceed with the KLEAN, ALERT, CONTEXT and any other clinical studies on Lexiva.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15:

GSK incorporates by reference its General Objections. GSK objects to this request to the extent it seeks documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "decision to proceed." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the

disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search relating to the therapeutic performance, safety or efficacy of Lexiva and Agenerase when used to treat HIV/AIDS. GSK also refers Abbott to its response to Request No. 18.

REQUEST FOR PRODUCTION NO. 16:

All publications resulting from the KLEAN, ALERT, and CONTEXT studies.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16:

GSK incorporates by reference its General Objections. GSK objects to this request to the extent it seeks documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search relating to the therapeutic performance, safety or efficacy of Lexiva and Agenerase when used to treat HIV/AIDS. GSK also refers Abbott to its response to Request No. 18.

REQUEST FOR PRODUCTION NO. 17:

All adverse event reports relating to Lexiva.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17:

GSK incorporates by reference its General Objections. GSK objects to this request to the extent it seeks documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "adverse event reports." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search relating to the therapeutic performance, safety or efficacy of Lexiva and Agenerase when used to treat HIV/AIDS. GSK also refers Abbott to its response to Request No. 18.

REQUEST FOR PRODUCTION NO. 18:

New Drug Application ("NDA") No. 21-548.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18:

GSK incorporates by reference its General Objections. GSK objects to this request to the extent it seeks documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. Subject to and without waiving the foregoing General and Specific Objections, GSK will produce the requested document for inspection.

REQUEST FOR PRODUCTION NO. 19:

All documents concerning the allegations in your Complaint, including: (i) documents you used, relied upon or referenced in drafting your Complaint; and (ii) documents that support the allegations in your Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 19:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because this request, if read literally, encompasses every document relating to GSK's business in designing, developing, manufacturing, selling and distributing protease inhibitors. Further, GSK objects because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 20:

All documents you intend to introduce or rely upon at trial.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK objects to this request as premature. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. GSK will identify documents it may introduce as evidence at trial at the time and in the manner specified in the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Local Rules, and any other applicable Orders or rules.

REQUEST FOR PRODUCTION NO. 21:

All documents received or obtained from Abbott Competitors during the course of this litigation that relate in any way to the subject matter, underlying facts or claims set forth in your Complaint, including all documents obtained pursuant to subpoena.

RESPONSE TO REQUEST FOR PRODUCTION NO. 21:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly as relates to the term "Abbott Competitors." GSK objects to this request as vague and ambiguous and failing to describe with reasonable particularity the documents requested for production. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, is already in Abbott's possession, or has been produced by

Abbott to GSK or plaintiffs in the related cases. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 22:

All documents identified in your responses to Abbott's interrogatories, or referred to or relied upon in preparing such responses.

RESPONSE TO REQUEST FOR PRODUCTION NO. 22:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents identified in its responses to Abbott's interrogatories.

REQUEST FOR PRODUCTION NO. 23:

All documents relating to the pricing of your ARV Drugs and the factors that determine how you set the prices for such drugs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23:

GSK incorporates by reference its General Objections. GSK objects to this request to the extent it seeks documents not reasonably calculated to lead to the discovery of admissible

evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly as relates to the term "ARV Drugs." GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing, and forecasting for GSK's protease inhibitors, which GSK believes will include the requested documents to the extent these documents concern GSK's protease inhibitors when used to treat HIV/AIDS.

REQUEST FOR PRODUCTION NO. 24:

All documents and communications relating to any discussions with Abbott concerning the License Agreement.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "License Agreement." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search relating to any discussions with Abbott concerning the agreement

between Abbott and GSK dated December 13, 2002 concerning coprescription and coadministration rights to ritonavir.

REQUEST FOR PRODUCTION NO. 25:

All documents relating to your pricing and profit strategies for your ARV drugs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 25:

GSK incorporates by reference its General Objections. GSK objects to this request to the extent it seeks documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly as relates to the term "ARV Drugs." GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents as set forth in its response to Request Nos. 23 and 26.

REQUEST FOR PRODUCTION NO. 26:

All price-related analysis relating to Lexiva.

RESPONSE TO REQUEST FOR PRODUCTION NO. 26:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "price-related." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this

request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors, which GSK believes will include the requested documents.

REQUEST FOR PRODUCTION NO. 27:

All communications relating to the price of your ARV Drugs, including all complaints and concerns that your ARV Drugs are priced too high.

RESPONSE TO REQUEST FOR PRODUCTION NO. 27:

GSK incorporates by reference its General Objections. GSK further objects to the extent this request seeks documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as relates to the term "ARV Drugs." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors, which GSK believes will include the requested documents to the extent these documents concern GSK's protease inhibitors when used to treat HIV/AIDS.

REQUEST FOR PRODUCTION NO. 28:

All marketing materials relating to your ARV Drugs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 28:

GSK incorporates by reference its General Objections. GSK further objects to the extent this request seeks documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly to as relates to the term "ARV Drugs." GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors, which GSK believes will include the requested documents to the extent these documents concern GSK's protease inhibitors when used to treat HIV/AIDS.

REQUEST FOR PRODUCTION NO. 29:

All market research materials related to Lexiva, including all internal and third party (e.g., TVG and EIDETICS) marketing research and analysis materials.

RESPONSE TO REQUEST FOR PRODUCTION NO. 29:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other

applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing of GSK's protease inhibitors.

REQUEST FOR PRODUCTION NO. 30:

All Board of Director Minutes and materials related to Lexiva.

RESPONSE TO REQUEST FOR PRODUCTION NO. 30:

GSK incorporates by reference its General Objections. GSK further objects to the extent this request seeks documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "Board of Directors … materials." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged Board of Directors Minutes and presentations relating to the marketing, pricing, and forecasting for Lexiva located after a reasonable search.

REQUEST FOR PRODUCTION NO. 31:

All documents discussing your strategy or strategies for marketing your ARV Drugs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly as relates to the term "ARV Drugs." GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing of GSK's protease inhibitors, which GSK believes will include the requested documents to the extent these documents concern GSK's protease inhibitors when used to treat HIV/AIDS.

REQUEST FOR PRODUCTION NO. 32:

All documents sufficient to calculate the total research and development costs of each of your ARV Drugs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly as relates to the term "ARV Drugs." GSK further objects to this request as vague and ambiguous, particularly as to the terms "research and development" and "costs." GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents, created

from January 1, 1999 to the present, located after a reasonable search sufficient to calculate the total research and development costs for Lexiva and Agenerase.

REQUEST FOR PRODUCTION NO. 33:

All licensing agreements related to your ARV Drugs, including all licenses related to Lexiva (fosamprenavir).

RESPONSE TO REQUEST FOR PRODUCTION NO. 33:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly as relates to the term "ARV Drugs." GSK further objects to this request as vague and ambiguous, particularly as to the term "related to." GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce license agreements entered into from January 1, 1999 to the present concerning the intellectual property embodied in Agenerase (amprenavir) and/or Lexiva (fosamprenavir) or concerning the ability of GSK to promote Agenerase and/or Lexiva to be coadministered and copromoted with ritonavir that are located after a reasonable search.

REQUEST FOR PRODUCTION NO. 34:

All documents relating to or discussing Norvir (ritonavir, RTV).

RESPONSE TO REQUEST FOR PRODUCTION NO. 34:

GSK incorporates by reference its General Objections. GSK further objects to the extent this request seeks documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further

objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search relating to the use of Norvir to treat HIV/AIDS.

REQUEST FOR PRODUCTION NO. 35:

All documents relating to or discussing Kaletra (lopinavir/ritonavir).

RESPONSE TO REQUEST FOR PRODUCTION NO. 35:

GSK incorporates by reference its General Objections. GSK further objects to the extent this request seeks documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search relating to the use of Kaletra to treat HIV/AIDS.

REQUEST FOR PRODUCTION NO. 36:

All documents relating to the life cycle strategy of amprenavir and fosamprenavir.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "life cycle strategy." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors, which GSK believes will include the requested documents.

REQUEST FOR PRODUCTION NO. 37:

All communications, including all letters and e-mails, relating to Norvir's price increase.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and

General Objections, GSK will produce nonprivileged documents responsive to this request located after a reasonable search.

REQUEST FOR PRODUCTION NO. 38:

All communications, including all letters and e-mails, with any television or newspaper reporters (or their employees or staff) related to Norvir, Kaletra and/or Norvir's price increase.

RESPONSE TO REQUEST FOR PRODUCTION NO. 38:

See GSK's Response to Request No. 37.

REQUEST FOR PRODUCTION NO. 39:

All documents discussing your (or any of your ARV Drugs') share of the ARV Drug market.

RESPONSE TO REQUEST FOR PRODUCTION NO. 39:

GSK incorporates by reference its General Objections. GSK further objects to the extent this request seeks documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly as relates to the term "ARV Drugs." GSK further objects to this request as vague and ambiguous, particularly as to the term "ARV Drug market." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search that GSK believes will be sufficient to show market share from January 1, 1999 to the present to the extent these documents concern GSK's protease inhibitors when used to treat HIV/AIDS.

REQUEST FOR PRODUCTION NO. 40:

All documents discussing your (or any of your ARV Drugs') share of the "market for PI boosters" as that term is used in your Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 40:

GSK incorporates by reference its General Objections. GSK further objects to the extent this request seeks documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly as relates to the term "ARV Drugs." GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search that GSK believes will be sufficient to show market share from January 1, 1999 to the present to the extent these documents concern GSK's protease inhibitors when used to treat HIV/AIDS.

REQUEST FOR PRODUCTION NO. 41:

All documents used in calculating the respective market shares of Lexiva and/or Kaletra in the "market for PI boosters," as that term is used in your Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 41:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "used in calculating." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the

attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors, which GSK believes will include the requested documents.

REQUEST FOR PRODUCTION NO. 42:

All documents relating to your forecasting or projections concerning the ARV Drug market.

RESPONSE TO REQUEST FOR PRODUCTION NO. 42:

GSK incorporates by reference its General Objections. GSK further objects to this request as seeking documents not reasonably calculated to lead to admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly as relates to the term "ARV Drug." GSK further objects to this request as vague and ambiguous, as to the term "ARV Drug market." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents that constitute forecasts for GSK's protease inhibitors that are located after a reasonable search.

REQUEST FOR PRODUCTION NO. 43:

All documents relating to your forecasting or projections concerning the "market for PI boosters," as that term is used in your Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 43:

See GSK's Response to Request No. 42.

REQUEST FOR PRODUCTION NO. 44:

All documents relating to your forecasting or projections concerning revenue and/or sales of Kaletra, Norvir, Reyataz and/or Lexiva.

RESPONSE TO REQUEST FOR PRODUCTION NO. 44:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors, which GSK believes will include the requested documents.

REQUEST FOR PRODUCTION NO. 45:

All documents relating to the different factors that influence physician prescribing practices or preferences for ARV Drugs, including any research revealing physician prescribing preferences and the factors influencing ARV Drug prescriptions.

RESPONSE TO REQUEST FOR PRODUCTION NO. 45:

GSK incorporates by reference its General Objections. GSK objects to this request as seeking documents not reasonably calculated to lead to admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly as relates to the term "ARV Drugs." GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce such nonprivileged documents relating to physician prescribing practices and preferences for GSK's protease inhibitors that are located after a reasonable search.

REQUEST FOR PRODUCTION NO. 46:

All documents relating to the different factors that influence patient preferences for ARV Drugs, including any research revealing patient preferences and the factors influencing ARV Drug prescriptions or adherence.

RESPONSE TO REQUEST FOR PRODUCTION NO. 46:

GSK incorporates by reference its General Objections. GSK futher objects to this request as seeking documents not reasonably calculated to lead to admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly as to the term "ARV Drugs." GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information

that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search relating to patient preferences for GSK's protease inhibitors.

REQUEST FOR PRODUCTION NO. 47:

All documents that relate to or discuss the validity and/or enforceability of the Abbott Patents.

RESPONSE TO REQUEST FOR PRODUCTION NO. 47:

GSK incorporates by reference its General Objections. GSK further objects to this request as seeking documents that are not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 48:

All other documents relating to the Abbott Patents, including but not limited to documents that discuss the scope, meaning, and/or interpretation of such patents or any claims therein.

RESPONSE TO REQUEST FOR PRODUCTION NO. 48:

GSK incorporates by reference its General Objections. GSK further objects to this request as seeking documents that are not reasonably calculated to lead to the discovery of admissible

evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 49:

All prior art documents to the Abbott Patents.

RESPONSE TO REQUEST FOR PRODUCTION NO. 49:

GSK incorporates by reference its General Objections. GSK further objects to this request as seeking documents that are not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 50:

All documents relating to any government investigation into or concerning one or more of your ARV Drugs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 50:

GSK incorporates by reference its General Objections. GSK further objects to this request as seeking documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly as relates to the term "your ARV Drugs." GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 51:

All documents relating to any government investigation into or concerning the pricing of one or more of your ARV Drugs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 51:

GSK incorporates by reference its General Objections. GSK further objects to this request as seeking documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly as relates to the term "ARV Drugs." GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession.

REQUEST FOR PRODUCTION NO. 52:

All FDA warning letters in the last ten years that relate in any way to one or more of your ARV drugs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 52:

GSK incorporates by reference its General Objections. GSK further objects to this request as seeking documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly as relates to the term "ARV Drugs" and to the overly broad time period. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 53:

All documents comparing the characteristics or performance of Lexiva against the characteristics or performance of any other ARV Drug.

RESPONSE TO REQUEST FOR PRODUCTION NO. 53:

GSK incorporates by reference its General Objections. GSK further objects to this request to the extent it seeks documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly as relates to the term "ARV Drug." GSK further objects to this request as vague and ambiguous, particularly as to the term "performance." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this

request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search relating to the therapeutic performance, safety or efficacy of Lexiva and Agenerase when used to treat HIV/AIDS. GSK also refers Abbott to its response to Request No. 18.

REQUEST FOR PRODUCTION NO. 54:

All documents that discuss or relate to the safety, performance and/or efficacy of Lexiva, Agenerase and/or any other protease inhibitor developed, marketed or sold by GSK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 54:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "performance." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search relating to the therapeutic performance, safety or efficacy of Lexiva and Agenerase when used to treat HIV/AIDS. GSK also refers Abbott to its response to Request No. 18.

REQUEST FOR PRODUCTION NO. 55:

All documents that discuss or relate to the safety, performance and/or efficacy of Norvir.

RESPONSE TO REQUEST FOR PRODUCTION NO. 55:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "performance." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search relating to the therapeutic performance, safety or efficacy of Norvir when used to treat HIV/AIDS.

REQUEST FOR PRODUCTION NO. 56:

All documents that discuss or relate to the safety, performance and/or efficacy of Kaletra.

RESPONSE TO REQUEST FOR PRODUCTION NO. 56:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "performance." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located

after a reasonable search relating to the therapeutic performance, safety or efficacy of Kaletra when used to treat HIV/AIDS.

REQUEST FOR PRODUCTION NO. 57:

All documents that discuss the comparative safety, performance and/or efficacy of Lexiva and Agenerase.

RESPONSE TO REQUEST FOR PRODUCTION NO. 57:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "performance." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search relating to the therapeutic performance, safety or efficacy of Lexiva and Agenerase when used to treat HIV/AIDS. GSK also refers Abbott to its response to Request No. 54.

REQUEST FOR PRODUCTION NO. 58:

All documents that discuss the comparative safety, performance and/or efficacy of Lexiva and Kaletra.

RESPONSE TO REQUEST FOR PRODUCTION NO. 58:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "performance." GSK further objects to this request to the extent that this request calls for production of documents and

information that are protected by the attorney-client privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search relating to the therapeutic performance, safety or efficacy of Lexiva and Kaletra when used to treat HIV/AIDS. GSK also refers Abbott to its response to Request Nos. 54 and 56.

REQUEST FOR PRODUCTION NO. 59:

All documents relating to physician perception of the safety, performance and/or efficacy of Kaletra, Norvir, Lexiva, Agenerase and/or any other protease inhibitor developed, marketed or sold by GSK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 59:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the terms "performance" and "physician perception." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search relating to the therapeutic performance, safety or efficacy of Kalerta, Norvir, Lexiva, and Agenerase when used to treat

HIV/AIDS. GSK also refers Abbott to its response to Request No. 18. GSK also refers Abbott to its response to Request Nos. 54, 55 and 56.

REQUEST FOR PRODUCTION NO. 60:

All documents relating to patient perception of the safety, performance and/or efficacy of Kaletra, Norvir, Lexiva, Agenerase and/or any other protease inhibitor developed, marketed or sold by GSK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 60:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "patient perception" and "performance." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search relating to the therapeutic performance, safety or efficacy of Kaletra, Norvir, Lexiva and Agenerase when used to treat HIV/AIDS. GSK also refers Abbott to its response to Request No. 18. GSK also refers Abbott to its response to Request Nos. 54, 55 and 56.

REQUEST FOR PRODUCTION NO. 61:

All documents relating to your actual or contemplated decision to take Agenerase off the market.

RESPONSE TO REQUEST FOR PRODUCTION NO. 61:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further

objects to this request as vague and ambiguous, particularly as to the term "contemplated decision." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors, which GSK believes will include the requested documents.

REQUEST FOR PRODUCTION NO. 62:

All documents relating to your actual or contemplated decision to take any other pharmaceutical product off the market.

RESPONSE TO REQUEST FOR PRODUCTION NO. 62:

GSK incorporates by reference its General Objections. GSK further objects that this request is not seeking documents reasonable calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly as relates to the term "any other pharmaceutical product." GSK further objects to this request as vague and ambiguous, particularly as relates to the terms "contemplated decision" and "any other pharmaceutical product." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it

seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 63:

All documents relating to each and every price increase GSK took on Agenerase between the time of its launch and its removal from the marketplace, including documents discussing the reasons for the increases and the amounts of the increases.

RESPONSE TO REQUEST FOR PRODUCTION NO. 63:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors, which GSK believes will include the requested documents.

REQUEST FOR PRODUCTION NO. 64:

All documents relating to your price lists, pricing plans, pricing policies, pricing forecasts, pricing strategies, and pricing decisions relating to all of your ARV Drugs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 64:

GSK incorporates by reference its General Objections. GSK further objects to this request to the extent it seeks documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly as relates to the term "ARV Drugs." GSK further

objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents as set forth in its response to Request Nos. 23.

REQUEST FOR PRODUCTION NO. 65:

All documents sufficient to show total sales of Lexiva by types of payor, such as Medicaid, ADAP, out of pocket, and private insurance for each month since its launch.

RESPONSE TO REQUEST FOR PRODUCTION NO. 65:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is unduly burdensome. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged financial documents, created from January 1, 1999 to the present, sufficient to show total sales of Lexiva by types of payor.

REQUEST FOR PRODUCTION NO. 66:

All documents sufficient to show the costs associated with manufacturing Lexiva for each month since its launch.

RESPONSE TO REQUEST FOR PRODUCTION NO. 66:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "costs associated with manufacturing." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged financial documents, created from January 1, 1999 to the present, sufficient to show Lexiva's costs.

REQUEST FOR PRODUCTION NO. 67:

All documents sufficient to show the costs associated with the sale of Lexiva, including any amounts paid as royalties or licensing fees, for each month since its launch.

RESPONSE TO REQUEST FOR PRODUCTION NO. 67:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "costs associated with the sale." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily

available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged financial documents, created from January 1, 1999 to the present, sufficient to show Lexiva's costs.

REQUEST FOR PRODUCTION NO. 68:

All documents sufficient to show the amount of profits attributable to sales of Lexiva for each month since its launch.

RESPONSE TO REQUEST FOR PRODUCTION NO. 68:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "profits." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged financial documents, created from January 1, 1999 to the present, sufficient to show profits, as GSK calculates them in the ordinary course of business, attributable to Lexiva.

REQUEST FOR PRODUCTION NO. 69:

All documents related to any antitrust case you were involved in, or are currently involved in, in which you took a position on the definition of any relevant market for pharmaceutical products or ARV Drugs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 69:

GSK incorporates by reference its General Objections. GSK further objects to this request as seeking documents not reasonable calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive, particularly as relates to the terms "pharmaceutical products or ARV Drugs." GSK further objects to this request as vague and ambiguous, particularly as to the term "pharmaceutical products." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 70:

All documents you produced, filed, or served in *AIDS Healthcare Foundation v. GSK*, Case No. 02 -5223 TJH-Ex, filed on July 1, 2002 in the United States District Court for the Central District of California.

RESPONSE TO REQUEST FOR PRODUCTION NO. 70:

GSK incorporates by reference its General Objections. GSK further objects to this request as seeking documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 71:

All documents you produced, filed, or served in *Chemi Spa v. GlaxoSmithKline*, 04-4545, 2004 U.S. Dist. LEXIS 25335 (E.D. Pa. 2004).

RESPONSE TO REQUEST FOR PRODUCTION NO. 71:

GSK incorporates by reference its General Objections. GSK further objects to this request as seeking documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 72:

All pleadings, depositions transcripts, deposition exhibits, hearing transcripts, and expert reports relating to A*IDS Healthcare Foundation v. GSK*, Case No. 02-5223 TJH-Ex., filed on July 1, 2002 in the United States District Court for the Central District of California.

RESPONSE TO REQUEST FOR PRODUCTION NO. 72:

GSK incorporates by reference its General Objections. GSK further objects to this request as seeking documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 73:

All pleadings, depositions transcripts, deposition exhibits, hearing transcripts, and expert reports relating to *Chemi Spa v. GlaxoSmithKline*, 04-4545, 2004 U.S. Dist. LEXIS 25335 (E.D. Pa. 2004).

RESPONSE TO REQUEST FOR PRODUCTION NO. 73:

GSK incorporates by reference its General Objections. GSK further objects to this request as seeking documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 74:

All documents relating to any position you took in *AIDS Healthcare Foundation v. GSK*, Case No. 02-5223 TJH-Ex, filed on July 1, 2002 in the United States District Court for the Central District of California, regarding the definition of the relevant markets.

RESPONSE TO REQUEST FOR PRODUCTION NO. 74:

GSK incorporates by reference its General Objections. GSK further objects to this request as seeking documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects

to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 75:

All documents relating to any position you took in *Chemi Spa v. GlaxoSmithKline*, 04-4545, 2004 U.S. Dist. LEXIS 25335 (E.D. Pa. 2004) regarding the definition of the relevant markets.

RESPONSE TO REQUEST FOR PRODUCTION NO. 75:

GSK incorporates by reference its General Objections. GSK further objects to this request as seeking documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 76:

All documents relating to the Competition Commission of South Africa's 2002 conclusion that you "abused [your] dominance and contravened sections 8(a) (excessive pricing), 8(b) (refusing a competitor access to an essential facility) and 8(c) (an exclusionary act)" of the Competition Act.

RESPONSE TO REQUEST FOR PRODUCTION NO. 76:

GSK incorporates by reference its General Objections. GSK further objects to this request as seeking documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK

further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 77:

All documents relating to your discussions or negotiations with the Competition Commission of South Africa and others regarding your issuance of four patented licenses of anti-retroviral drugs to generic manufacturers.

RESPONSE TO REQUEST FOR PRODUCTION NO. 77:

GSK incorporates by reference its General Objections. GSK further objects to this request as seeking documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 78:

All documents relating to any position you took on the definition of the relevant markets in your dealings with the Competition Commission of South Africa.

RESPONSE TO REQUEST FOR PRODUCTION NO. 78:

GSK incorporates by reference its General Objections. GSK further objects to this request as seeking documents not reasonably calculated to lead to the discovery of admissible evidence. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 79:

GSK's communications, including all letters and e-mails, with any federal or state government agencies (e.g., attorneys general's offices, FTC, NIH, FDA, DHHS, DOJ), employees, or elected officials (e.g., members of Congress or state legislature) related to Norvir, Kaletra and/or Norvir's price increase.

RESPONSE TO REQUEST FOR PRODUCTION NO. 79:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the attorney work-product doctrine, the informer privilege or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and

General Objections, GSK will produce nonprivileged documents as set forth in its response to Request No. 37.

REQUEST FOR PRODUCTION NO. 80:

All documents concerning or relating to your claim that Abbott violated the Sherman Act, as alleged in Count 1 of your Complaint, including but not limited to: (i) all documents that support your allegations in Count 1; and (ii) all documents upon which you intend to rely at trial.

RESPONSE TO REQUEST FOR PRODUCTION NO. 80:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because this request, if read literally, encompasses every document relating to GSK's business in designing, developing, manufacturing, selling and distributing protease inhibitors. Further, GSK objects because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint. GSK will identify documents it may introduce as evidence at trial at the time and in the manner specified in the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Local Rules, and any other applicable Orders or rules.

REQUEST FOR PRODUCTION NO. 81:

All documents relating to your allegation that Abbott engaged in anticompetitive conduct or activities.

RESPONSE TO REQUEST FOR PRODUCTION NO. 81:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 82:

All documents relating to your allegation that "Abbott schemed to remove" Norvir from the market for boosted PIs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 82:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as

vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 83:

All documents relating to your allegation that "Abbott acted with a specific intent to achieve an anticompetitive purpose," including "eliminate[ing] competitors from the market for boosted PIs and to unlawfully acquire or maintain a monopoly in the boosted PI market." (Compl. ¶ 57).

RESPONSE TO REQUEST FOR PRODUCTION NO. 83:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily

available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 84:

All documents relating to your allegation that Abbott's alleged misconduct "has harmed the open and free market, restraining competition and threatening to continue to restrain competition." (Compl. ¶ 61).

RESPONSE TO REQUEST FOR PRODUCTION NO. 84:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 85:

All documents relating to your allegation that "Abbott's anticompetitive scheme protected Kaletra against new competitors that threatened its market dominance." (Compl. ¶ 1).

RESPONSE TO REQUEST FOR PRODUCTION NO. 85:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 86:

All documents relating to your allegation that "Abbott's action forced" patients using competitors' PIs "either to pay exorbitant new prices or to use Abbott's PI." (Compl.¶ 1).

RESPONSE TO REQUEST FOR PRODUCTION NO. 86:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as

vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 87:

All documents relating to your allegation that Abbott's alleged anticompetitive activities have caused medical hospitals to revise their formularies.

RESPONSE TO REQUEST FOR PRODUCTION NO. 87:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to

disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 88:

All documents relating to your allegations regarding the definition of the relevant markets, including your allegation that: (i) the "market for PI boosters" consists of "all drugs that could be used to boost the effects of PIs"; (ii) the "market for boosted PIs" consists of "those PIs that benefit from a PI booster"; and (iv) the geographic scope of both markets is the United States. (Compl. ¶¶ 39-40, 42).

RESPONSE TO REQUEST FOR PRODUCTION NO. 88:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK also objects to this request to the extent it prematurely seeks expert discovery. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 89:

All documents relating to the pricing of products in the market for PI boosters and the market for boosted PIs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 89:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. GSK objects to the extent this request prematurely seeks expert discovery. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents responsive to this request that are located after a reasonable search.

REQUEST FOR PRODUCTION NO. 90:

All documents relating to the costs of products in the market for PI boosters and the market for boosted PIs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 90:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term “costs of products.” GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available

from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. GSK objects to the extent this request prematurely seeks expert discovery.

REQUEST FOR PRODUCTION NO. 91:

All documents relating to the past, current, future and potential market shares of the products in the market for boosted PIs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 91:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. GSK objects to the extent this request prematurely seeks expert discovery. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search that GSK believes will be sufficient to show market share from January 1, 1999 to the present to the extent these documents concern GSK’s protease inhibitors when used to treat HIV/AIDS.

REQUEST FOR PRODUCTION NO. 92:

All scientific or journal articles related to the efficacy, benefits, or side effects of products in the market for boosted PIs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 92:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further

objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search relating to the therapeutic performance, safety or efficacy of Lexiva and Agenerase when used to treat HIV/AIDS. GSK also refers Abbott to its response to Request No. 18.

REQUEST FOR PRODUCTION NO. 93:

All documents relating to your allegation that Abbott "targeted" GSK. (Compl. ¶ 2).

RESPONSE TO REQUEST FOR PRODUCTION NO. 93:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the

documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 94:

All documents relating to your allegation that Abbott "demanded" a License Agreement from GSK. (Compl. ¶ 2).

RESPONSE TO REQUEST FOR PRODUCTION NO. 94:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to and without waiving its foregoing General and Specific objections, GSK refers Abbott to its response to Request No. 124.

REQUEST FOR PRODUCTION NO. 95:

All documents relating to your allegation that "Abbott explicitly considered the negative impacts of its price hike." (Compl. ¶ 2).

RESPONSE TO REQUEST FOR PRODUCTION NO. 95:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A

and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 96:

All documents relating to your allegation that Abbott harmed "competition in the markets into which PIs are sold, harming GSK and Abbott's other competitors in those markets and harming the HIV/AIDS community." (Compl. ¶ 3).

RESPONSE TO REQUEST FOR PRODUCTION NO. 96:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK also objects to the extent this request prematurely seeks expert discovery. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this

request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 97:

All documents relating to your allegation that Abbott had a "contractual obligation" not to raise the price of Norvir. (Compl. ¶ 2).

RESPONSE TO REQUEST FOR PRODUCTION NO. 97:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to and without waiving its foregoing General and Specific Objections, GSK refers Abbott to its response to Request No. 124.

REQUEST FOR PRODUCTION NO. 98:

All documents relating to your allegation that Abbott's pricing decision "was designed to render Norvir essentially inaccessible to a wide array of patients." (Compl. ¶ 2).

RESPONSE TO REQUEST FOR PRODUCTION NO. 98:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 99:

All documents relating to your allegation that "Lexiva sales have fallen short of pre-release forecasts prepared for and by GSK." (Compl. ¶ 3).

RESPONSE TO REQUEST FOR PRODUCTION NO. 99:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as

vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors. GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 100:

All documents relating to your allegation that "Abbott's anticompetitive conduct caused GSK to lose sales, profits and market share for Lexiva and its other PI products." (Compl. ¶ 3).

RESPONSE TO REQUEST FOR PRODUCTION NO. 100:

See GSK's Response to Request No. 99. GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 101:

All documents relating to your allegation that "Abbott's misconduct interfered with, and continues to interfere with, GSK's ability to serve the HIV/AIDS community and to provide the treatments that HIV-positive patients need." (Compl. ¶ 3).

RESPONSE TO REQUEST FOR PRODUCTION NO. 101:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because

documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors. GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 102:

All documents relating to your allegation that "Abbott's price increase has the effect of limiting the types of PIs available to patients - thus interfering with their ability to effectively treat the disease." (Compl. ¶ 4).

RESPONSE TO REQUEST FOR PRODUCTION NO. 102:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK also objects to this request to the extent it prematurely seeks expert discovery.

GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors. GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 103:

All documents relating to your allegation that "GSK has been harmed in North Carolina by Abbott's misconduct." (Compl. ¶ 5).

RESPONSE TO REQUEST FOR PRODUCTION NO. 103:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to

disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 104:

All documents relating to your allegation that "Abbott spent significantly less in developing Norvir than typical for other major pharmaceutical drugs." (Compl. ¶ 14).

RESPONSE TO REQUEST FOR PRODUCTION NO. 104:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 105:

All documents relating to your allegation that Abbott executives "formulated an anticompetitive scheme using Abbott's control of Norvir as leverage to maintain or increase Kaletra's dominant market position." (Compl. ¶ 24).

RESPONSE TO REQUEST FOR PRODUCTION NO. 105:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 106:

All documents relating to your allegation that Abbott's price increase raised "the wholesale acquisition cost of GSK's boosted Lexiva treatment from $19.43 to $33.15." (Compl. ¶ 30).

RESPONSE TO REQUEST FOR PRODUCTION NO. 106:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production

of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 107:

All documents relating to your allegation that Abbott's communications following its price increase of Norvir "had the intention and effect of confusing prescribers and purchasers about the real impact of the price increase." (Compl. ¶ 31).

RESPONSE TO REQUEST FOR PRODUCTION NO. 107:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the

documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 108:

All documents relating to your allegation that the price increase "had the effect of leveraging Abbott's monopoly power over PI boosters into the boosted market." (Compl. ¶ 35).

RESPONSE TO REQUEST FOR PRODUCTION NO. 108:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 109:

All documents relating to your allegation that there are "substantial barriers to entry into both the markets for PI boosters and boosted PIs." (Compl. ¶ 41).

RESPONSE TO REQUEST FOR PRODUCTION NO. 109:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because

documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK also objects to the extent this request prematurely seeks expert discovery. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 110:

All documents relating to your statement that GSK had a "reasonable expectation" that "it would be able to promote the co-prescription and co-administration of its PI products with Norvir at prices competitive with those of Kaletra and other PIs." (Compl. ¶ 36).

RESPONSE TO REQUEST FOR PRODUCTION NO. 110:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer

privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to and without waiving its foregoing General and Specific Objections, GSK refers Abbott to its response to Request No. 124.

REQUEST FOR PRODUCTION NO. 111:

All documents relating to your allegation that Abbott raised the price of Norvir "knowingly and intentionally to interfere with sales of Lexiva and other boosted PIs." (Compl. ¶ 36).

RESPONSE TO REQUEST FOR PRODUCTION NO. 111:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 112:

All documents relating to your allegation that, in 2003, "Abbott's market share for boosted PIs exceeded 70 percent." (Compl. ¶ 40).

RESPONSE TO REQUEST FOR PRODUCTION NO. 112:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors. GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 113:

All documents relating to your allegation that "[t]hrough its course of dealing with its competitors, Abbott has facilitated the market for boosted PIs ... and caused its competitors to anticipate incremental" price increases for Norvir. (Compl. ¶ 44).

RESPONSE TO REQUEST FOR PRODUCTION NO. 113:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to its foregoing General and Specific Objections, GSK refers Abbott to its response to Request No. 124.

REQUEST FOR PRODUCTION NO. 114:

All documents relating to your allegation that Abbott's conduct "artificially reduced the demand for the boosted PIs of GSK and Abbott's other competitors, while artificially increasing demand for its own boosted PIs." (Compl. ¶ 45).

RESPONSE TO REQUEST FOR PRODUCTION NO. 114:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK also objects to the extent this request prematurely seeks expert discovery. GSK

further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors. GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 115:

All documents relating to your allegation that Abbott's conduct "has directly and proximately harmed competition in the market for boosted PIs," and that Abbott's conduct "excluded and handicapped its competitors." (Compl. ¶ 46).

RESPONSE TO REQUEST FOR PRODUCTION NO. 115:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK also objects to the extent this request prematurely seeks expert discovery. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public

sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search concerning marketing, pricing and forecasting for GSK's protease inhibitors. GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 116:

All documents relating to your allegation that Abbott's "justification" of its choice to raise the price of Norvir "is pretextual and does not legitimately promote competition." (Compl. ¶ 46).

RESPONSE TO REQUEST FOR PRODUCTION NO. 116:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 117:

All documents relating to your allegation that "Abbott's competitors in the boosted PI market, including GSK have suffered declines in revenue and reductions in the market share that they otherwise would have obtained." (Compl. ¶ 47).

RESPONSE TO REQUEST FOR PRODUCTION NO. 117:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to and without waiving its foregoing General and Specific Objections, GSK refers Abbott to its response to Request No. 42. GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 118:

All documents relating to your allegation that, as a result of Abbott's conduct, HIV patients and health care professionals have been harmed by "a) paying more for boosted PI treatments than they would have in the absence of Abbott's unlawful conduct; b) being denied the benefit of a broader variety of boosted PI treatments; and c) being denied the benefit of research

and development that likely would have resulted in alternative and superior forms of PI treatments." (Compl.¶ 48).

RESPONSE TO REQUEST FOR PRODUCTION NO. 118:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK objects to this request to the extent it prematurely seeks expert discovery. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to and without waiving its foregoing General and Specific Objections, GSK refers Abbott to its response to Request Nos. 23, 26 and 42. GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 119:

All documents relating to your allegation that "GSK's injuries are unique and are in addition to, not duplicative of or derivative of, any injuries suffered by its competitors or by consumers." (Compl. ¶ 49).

RESPONSE TO REQUEST FOR PRODUCTION NO. 119:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because

documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK objects to this request to the extent it prematurely seeks expert discovery. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 120:

All documents relating to your allegation that "Abbott targets markets in which GSK participates" and that Abbott "intended to harm GSK."

RESPONSE TO REQUEST FOR PRODUCTION NO. 120:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK

further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 121:

All documents relating to your allegation that GSK lost "the benefit of the bargain it struck with Abbott when GSK agreed to a license from Abbott." (Compl. ¶ 50).

RESPONSE TO REQUEST FOR PRODUCTION NO. 121:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to and without waiving its foregoing General and Specific Objections, GSK refers Abbott to its response to Request No. 124.

REQUEST FOR PRODUCTION NO. 122:

All documents relating to your allegation that Abbott took "for itself part or all of the expected and reasonably anticipated benefit of the agreement it entered with GSK." (Compl. ¶ 50).

RESPONSE TO REQUEST FOR PRODUCTION NO. 122:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to and without waiving its foregoing General and Specific Objections, GSK refers Abbott to its response to Request No. 124.

REQUEST FOR PRODUCTION NO. 123

All documents concerning your allegation or claim that Abbott violated the Covenant of Good Faith and Fair Dealing in Count 2 of your Complaint, including but not limited to: (i) all documents that support your allegations in Count 2; and (ii) all documents upon which you intend to rely at trial.

RESPONSE TO REQUEST FOR PRODUCTION NO. 123:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because this request, if read literally, encompasses every document relating to GSK's business in designing,

developing, manufacturing, selling and distributing protease inhibitors. Further, GSK objects because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint. GSK will identify documents it may introduce as evidence at trial at the time and in the manner specified in the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Local Rules, and any other applicable Orders or rules.

REQUEST FOR PRODUCTION NO. 124

All documents concerning or reflecting the negotiation of the License Agreement.

RESPONSE TO REQUEST FOR PRODUCTION NO. 124:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "License Agreement." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available

from public sources, is equally available to Abbott, or is already in Abbott's possession. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents located after a reasonable search relating to the negotiation of the agreement between Abbott and GSK dated December 13, 2002 concerning coprescription and coadministration rights to ritonavir.

REQUEST FOR PRODUCTION NO. 125

All documents relating to your allegation that the terms of the License Agreement "were based upon GSK's reasonable expectation ... that future increases in the price of Norvir would be consistent with past increases." (Compl. ¶ 64).

RESPONSE TO REQUEST FOR PRODUCTION NO. 125:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to and without waiving its foregoing General and Specific Objections, GSK refers Abbott to its response to Request No. 124.

REQUEST FOR PRODUCTION NO. 126

All documents relating to your allegation that Abbott's price increase of Norvir "dashed" GSK's "expectations under the [License Agreement] and thwarted GSK's ability to benefit from the contracted rights." (Compl. ¶ 64).

RESPONSE TO REQUEST FOR PRODUCTION NO. 126:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to and without waiving its foregoing General and Specific Objections, GSK refers Abbott to its response to Request No. 42. GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 127

All documents relating to your allegation that Abbott's price increase of Norvir "devastated the value of the License Agreement." (Compl. ¶ 64).

RESPONSE TO REQUEST FOR PRODUCTION NO. 127:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure

34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to and without waiving its foregoing General and Specific Objections, GSK refers Abbott to its response to Request No. 42. GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 128

All documents concerning your allegation or claim that Abbott violated the North Carolina Unfair Trade Practices Act, as alleged in Count 3 of your Complaint, including but not limited to: (i) all documents that support your allegations in Count 3; and (ii) all documents upon which you intend to rely at trial.

RESPONSE TO REQUEST FOR PRODUCTION NO. 128:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because this request, if read literally, encompasses every document relating to GSK's business in designing, developing, manufacturing, selling and distributing protease inhibitors. Further, GSK objects because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or

immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint. GSK will identify documents it may introduce as evidence at trial at the time and in the manner specified in the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Local Rules, and any other applicable Orders or rules.

REQUEST FOR PRODUCTION NO. 129

All documents relating to your allegation that Abbott "manipulated and exploited its position of power over Norvir." (Compl. ¶ 70).

RESPONSE TO REQUEST FOR PRODUCTION NO. 129:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK also objects to the extent this request prematurely seeks expert discovery. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the

foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 130

All documents relating to your allegation that Abbott "deliberately deceived its competitors and the public as to the true and illegitimate nature of the price increase." (Compl. ¶ 71).

RESPONSE TO REQUEST FOR PRODUCTION NO. 130:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint.

REQUEST FOR PRODUCTION NO. 131

All documents concerning your allegation or claim that Abbott violated the North Carolina Prohibition Against Monopolization in Count 4 of your Complaint, including but not limited to: (i)

all documents that support your allegations in Count 4; and (ii) all documents upon which you intend to rely at trial.

RESPONSE TO REQUEST FOR PRODUCTION NO. 131:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because this request, if read literally, encompasses every document relating to GSK's business in designing, developing, manufacturing, selling and distributing protease inhibitors. Further, GSK objects because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK believes that the documents it will be producing in response to other document requests will include all non-privileged documents from its files used, relied upon or referenced in filing its Complaint. GSK will identify documents it may introduce as evidence at trial at the time and in the manner specified in the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Local Rules, and any other applicable Orders or rules.

REQUEST FOR PRODUCTION NO. 132

All documents that substantiate or relate in any way to any damages you allegedly suffered because of Abbott's acts for which you are seeking recovery in this action.

RESPONSE TO REQUEST FOR PRODUCTION NO. 132:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive because documents supporting GSK's claims, including those referenced in the Complaint at Exhibits A and B, are in the possession, custody and control of Abbott. GSK further objects to this request as vague and ambiguous because this request fails to describe the requested documents with any particularity, let alone "reasonable particularity" as required under Federal Rule of Civil Procedure 34(b)(1)(A). GSK objects to the extent this request prematurely seeks expert discovery. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 133

All personnel and employment history files for any individual you expect to call as a witness in this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 133:

GSK incorporates by reference its General Objections. GSK further specifically objects that any witness's personnel and employment history files will not lead to the discovery of admissible evidence. GSK objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK objects to the extent this request prematurely seeks identification of trial witnesses. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or

immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 134

All documents concerning Lexiva, Agenerase, Kaletra or Norvir authored or received by any individual you expect to call as a witness in this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 134:

GSK incorporates by reference its General Objections. GSK further objects to the extent this request prematurely seeks identification of trial witnesses. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties. Subject to the foregoing Specific and General Objections, GSK will produce nonprivileged documents, to the extent they do not impinge upon individual privacy rights, for its trial witnesses at the time and in the manner these witnesses are identified in accordance with the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Local Rules, and any other applicable Orders or rules.

REQUEST FOR PRODUCTION NO. 135

All documents created or considered, in connection with this case, by any person whom you or your attorneys expect to use as an expert witness in this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 135:

GSK incorporates by reference its General Objections. GSK further objects that this request prematurely seeks expert discovery. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

REQUEST FOR PRODUCTION NO. 136

All communications between you and the other counsel in the related actions to this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 136:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous. GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the attorney work-product doctrine, the joint prosecution privilege or any other applicable privilege or immunity.

REQUEST FOR PRODUCTION NO. 137

All documents reviewed or relied upon by your expert witnesses.

RESPONSE TO REQUEST FOR PRODUCTION NO. 137:

See GSK's Response to Request No. 135.

REQUEST FOR PRODUCTION NO. 138

All documents reviewed or relied upon by your fact witnesses.

RESPONSE TO REQUEST FOR PRODUCTION NO. 138:

GSK incorporates by reference its General Objections. GSK further specifically objects to this request on the grounds that it is overbroad, unduly burdensome and oppressive. GSK further objects to this request as vague and ambiguous, particularly as to the term "reviewed and relied upon." GSK further objects to this request to the extent that this request calls for production of documents and information that are protected by the attorney-client privilege, the informer privilege, the attorney work-product doctrine or any other applicable privilege or immunity. GSK further objects to this request to the extent it seeks the disclosure of information that is readily available from public sources, is equally available to Abbott, or is already in Abbott's possession. GSK further objects to this request to the extent it seeks documents that GSK is not permitted to disclose pursuant to protective orders and/or confidentiality obligations or agreements with third parties.

Dated: April 15, 2008

IRELL & MANELLA LLP
ARNOLD & PORTER LLP

By: 
Trevor V. Stockinger
Attorney for GlaxoSmithKline

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 1800 Avenue of the Stars, Suite 900, Los Angeles, California 90067.

On April 15, 2008, I served the foregoing document described as **SUPPLEMENTAL RESPONSE TO ABBOTT LABORATORIES' FIRST SET OF REQUESTS FOR DOCUMENTS AND THINGS TO PLAINTIFF** on each interested party, as follows:

Charles B. Klein
Winston & Strawn LLP
1700 K Street, N.W.
Washington, D.C. 20006-3817
cklein@winston.com

[X] (BY OVERNIGHT DELIVERY SERVICE) I served the foregoing document by FedEx, an express service carrier which provides overnight delivery, as follows. I placed a true copy of the foregoing document in sealed envelopes or packages designated by the express service carrier, addressed, as set forth above, with fees for overnight delivery paid or provided for.

[X] (BOX DEPOSIT) I deposited such envelopes or packages in a box or other facility regularly maintained by the express service carrier.

[X] (BY ELECTRONIC MAIL) I caused the foregoing document to be served electronically by electronically mailing a true and correct copy through Irell & Manella LLP's electronic mail system to the e-mail address(es), as set forth above, and the transmission was reported as complete and no error was reported.

Executed on April 15, 2008, at Los Angeles, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Joshua Karp
(JKARP@IRELL.COM)
(Type or print name)

(Signature)

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